

Jorge Alejandro Rojas  
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Plaintiff in Pro Se  
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Bolingbrook, IL 60440  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,  
Plaintiff,  
v.  
UNPLUGGED MEDIA, LLC, et al,  
Defendants.

Case No. 2:23-cv-02667-AH-KS

**DECLARATION OF JORGE  
ALEJANDRO ROJAS IN SUPPORT  
OF REQUEST FOR ELECTRONIC  
APPEARANCE VIA ZOOM**

I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

1. I am the Plaintiff in this case, and make the following statements based on my personal knowledge and records. If called to testify concerning any of these statements, I will be able to do so.
2. I make the statements in this declaration in support of Plaintiff's Request for Electronic Appearance via Zoom.
3. Previously, with respect to another request for electronic appearance in this case, I e-mailed Defendant Alexander Bykhovsky concerning whether he would consent or not consent to my request for electronic appearance on March 22, 2024, and he stated in response on the same day "I'm not in the country, I don't consent to the Court's

1 jurisdiction over me.” I emailed him thereafter to ask for a time to confer prior to  
2 making the request in the earlier motion and he never responded.

3 4. Prior to making the request for default judgment in this case, I also sought conferral  
4 from each defendant as to a request to appear electronically, and I did not receive  
5 any response. I sent a further e-mail to Bykhovsky on April 14, 2025 seeking  
6 conferral for the request to appear electronically to the continued hearing scheduled  
7 for May 7, 2025, and did not receive a response. I also sent a conferral letter to each  
8 defendants last known address on April 16, 2025, and did not receive a response.

9 5. I am employed as a Systems Engineer, for a government contractor, and reside and  
10 work in a suburb of Chicago, Illinois.

11 6. My work schedule primarily consists of Monday through Friday, nine hours of work  
12 per day.

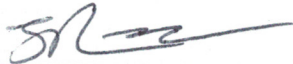
13 7. My current schedule for the week of the hearing would necessitate that I miss at least  
14 one, and possibly two days of work to attend the hearing in person, as I would travel  
15 from Chicago, Illinois. If I were to attend the hearing virtually the period which I  
16 miss would be shorter as I would not need to travel as well as be more economical  
17 because I would not need to purchase air fare. I would also need to arrange for  
18 someone to take over any customer meetings or commitments that I have for my  
19 position. Being able to attend the hearing virtually would allow for reduced  
20 interruption to my work schedule due to the associated travel and mitigate  
21 compression of my schedule.

22 8. When communicating with Defendant Bykhovsky concerning the entry of default  
23 against his company, Unplugged Media, LLC, he stated in response “I am in  
24 Panama. It is logistically impossible for me to address this until/unless I move back  
25 to the United States.”

26 9. I believe that attending the hearing virtually via Zoom would allow me the ability to  
27 answer any questions or concerns the Court has at oral argument concerning the  
28 pending motion for default judgment. I am unaware of any defendant intending to

1 attend based on their failure to appear, defend, or respond to the motion. No  
2 defendant appeared at the scheduled hearing on March 12, 2025.

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4 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
5 and correct. Executed on April 28, 2025, in Bolingbrook, IL.

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